



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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MEMORANDUM

TO: The Record

FROM: Mike Zimmerman, OSC

Mike Zimmerman

SUBJECT: Richardson Flats Tailings Removal Site Assessment
Under the NPL "Make Sites Safe Initiative"

After considerable effort the site assessment for Richardson Flats Tailings has been completed. Due to the program requirement to assess all listed and proposed NPL sites, Richardson Flats Tailings has been given a thorough Removal evaluation.

Unforeseen administrative and technical problems were encountered which hindered the progress of the assessment, therefore slippage of the schedule was encountered. A significant delay was encountered as the PRP objected to the integrity of groundwater monitoring wells nos. 2 and 3. Considerable effort and time was expended to review both wells and secure down-hole logging services to determine the integrity of the wells. As a result of the groundwater well evaluation EPA determined that the wells were not compromised. However, plugging and abandonment of monitoring well no. 2 was undertaken for the sake of future cooperative efforts. The attached TAT letter report, dated April 22, 1993, documents abandonment of the well.

EPA sampled and analyzed many physical site characteristics during the Removal Assessment. The TAT Final Report, dated February 19, 1993, summarizes the findings of the assessment. A thorough examination of the possibility for release of airborne contaminants (off-site migration); release of contaminants from the tailings area; release of contaminants from the municipal/sanitary landfill area; and site access controls were conducted. Off-site air quality, depth of cover of the tailings, tailings soil analyses, tailings containment structure, surface water, stream sediments, tailings groundwater, and landfill groundwater were scrutinized appropriately.

Two areas of contamination surfaced during the site assessment. First, a release of lead to Silver Creek from the Site was documented. During the assessment period, surface water

flow and runoff from the tailings appeared to be low. Therefore, it was not considered an immediate threat to human health and the environment. Secondly, sediments in the "wetland area" of the Site between the tailings dam and Silver Creek was observed to be contaminated with high levels of metals. This area, above Silver Creek, is subject to surface water flow from the diversion ditch and the seepage through the tailings containment structure. The contaminants appear to be immobile and do not present an immediate threat to human health and the environment. Both areas of concern were deemed conducive to comprehensive remedial actions as opposed to an emergency response.

In summary, Richardson Flats Tailings Site does not present an immediate threat to human health and environmental. Concerns are insufficient to initiate a Removal Action at this time. Site conditions may change in the future, therefore the Site should be re-evaluated during the Superfund Remedial process.

Attachments